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March 15, 2011

Ms. Andrea Needles  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: C00295527  
Reply to your February 28, 2011 correspondence concerning CU-PVF's  
September Monthly Report covering August 1, 2010 – August 31, 2010

Dear Ms. Needles:

I write in reply to your letter dated February 28, 2011, to Kevin Allen, Treasurer of Citizens United Political Victory Fund ("CU-PVF"), requesting additional information regarding CU-PVF's September 2010 Monthly Report, which covers the period August 1, 2010 through August 31, 2010. More specifically, you state that the report is missing contributor identification information for one or more of the contributions disclosed in Schedule A. But while your letter describes the information that is required to be disclosed, it does not identify any particular information that is missing with respect to any of the contributions disclosed in the report. Nevertheless, you request that CU-PVF either (a) file an amended report providing the unidentified missing information or (b) provide a detailed description of CU-PVF's procedures for complying with the Commission's "best efforts" requirements for obtaining the contributor identifier information required to be disclosed.

I have reviewed Schedule A of the Monthly Report and note that as follows: (1) there are contributions from seven individual donors in which the contributor's first name is listed as an initial, (2) in one instance a contributor's employer is listed as the letter "S" and in several instances "Information Requested" is listed as the employer/occupation of a contributor. CU-PVF is in the process of reviewing its records to determine if it has more complete identity information for any of those contributors. If more complete information is available, CU-PVF will file an amended report providing that information.

In the meantime, CU-PVF's treasurer believes that the procedures CU-PVF has established for obtaining and disclosing the identity of its contributors fully complies with the Commission's "best efforts" requirements. Those procedures are as follows:

First, a request for accurate and complete identification is made at the time of the initial solicitation to a prospective contributor. For written solicitations (e.g.

1006 Pennsylvania Avenue, SE ★ Washington, DC 20003  
Phone: (202) 547-1249 ★ Fax: (202) 547-5421 ★ cupvf.org

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Contributions or gifts to Citizens United Political Victory Fund are not tax deductible.*

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Letter to Andrea Needles  
Federal Election Commission  
March 15, 2011

Re: Reply to February 11, 2011 correspondence concern September 2010 Monthly Report covering August 1, 2010 – August 31, 2010.

Page 2 of 3

direct mail) a response form is included listing the contributor's name and address as it appears in Citizens United's membership records. The form includes a request that the contributor correct any inaccurate or missing information. The form also asks that the contributor provide his or her occupation and employer. For oral solicitations (e.g. telemarketing), the request is made orally as part of the solicitation script. In either case, the request includes a statement that Federal law requires CU-PVF to use its best efforts to obtain and report the required information for any person who contributes in excess of \$200 in a calendar year.

Second, a follow-up letter acknowledging the contribution is promptly mailed to each contributor requesting the required information. This letter is to be mailed within 30 days of receipt of a contribution and advises the contributor that Federal law requires CU-PVF to use best efforts to obtain the required information from all persons who contribute in excess of \$200 in a calendar year. The follow-up letter includes a form for providing the information. Enclosed with the follow-up letter and form is a pre-addressed envelope for returning the completed form to CU-PVF.

Third, if a contributor returns the completed form prior to the deadline for completing the FEC Report for which the information is required to be disclosed, the information is included in the initial report. If the information is provided subsequent to the filing of the initial report, it is CU-PVF's policy to file an amended report disclosing the newly obtained information on or before the due date for the next regularly scheduled report.

CU-PVF believes that the procedures described above fully conform with both the letter and spirit of the Commission's "best efforts" requirements. However, if you believe there is a deficiency in the process please let me know so that we can discuss any steps necessary to rectify the matter.

Please contact me if you should have any further questions regarding this matter. Thank you.

Sincerely,




Michael Boos  
Vice President &  
General Counsel  
Citizens United

cc: Kevin Allen, Treasurer, CU-PVF

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Federal Election Commission  
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